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 12 *Attorneys for Defendants District Healthcare Services, LLC,  
 13 Breaking Silos in Medicine, LLC, and Habib Shamte, M.D.*

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**UNITED STATES DISTRICT COURT**

15  
**DISTRICT OF NEVADA**

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 17 CF STAFFING SOLUTIONS, LLC, a Nevada  
 Limited-Liability Company; MAX CASAL, an  
 individual,

18 Plaintiffs,

19 vs.

20 DISTRICT HEALTHCARE SERVICES, LLC,  
 a foreign Corporation; BREAKING SILOS IN  
 MEDICINE, LLC, a foreign corporation;  
 HABIB SHAMTE, M.D., an individual; DOES I  
 through X; AND ROE CORPORATIONS  
 21 through X, inclusive,

22 Defendants.

CASE NO. 2:24-cv-02355-GMN-EJY

(District Court of Clark County Nevada Case  
 No. A-24-905033-C)

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO EXTEND DEADLINE TO  
 RESPOND TO FIRST AMENDED  
 COMPLAINT**

**(First Request)**

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 25 Pursuant to LR IA 6-1, Plaintiffs CF Staffing Solutions, LLC (“CF Staffing”) and Max  
 26 Casal (“Mr. Casal,” together with CF Staffing “Plaintiffs”), by and through their counsel of  
 27 record, the Law Office of Hayes & Welsh, and Defendants District Healthcare Services, LLC  
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1 (“District Healthcare”), Breaking Silos in Medicine, LLC (“Breaking Silos”), and Habib Shamte,  
 2 M.D. (“Dr. Shamte,” together with District Healthcare and Breaking Silos, “Defendants”), by  
 3 and through their counsel of record, Dickinson Wright PLLC, hereby stipulate as follows:

- 4 1. Defendants filed a Motion to Dismiss to Plaintiffs’ Complaint on December 26, 2024  
       5 (ECF No. 3) and a Motion to Dismiss Plaintiffs’ First Amended Complaint on  
       6 January 1, 2025 (ECF No. 12).
- 7 2. Plaintiffs filed their Opposition to Defendants’ Motion to Dismiss on March 3, 2025  
       8 (ECF No. 20).
- 9 3. On May 2, 2025, the Order Denying Defendants’ Motion to Dismiss was filed and  
       10 served (ECF No. 24).
- 11 4. Defendants’ Answer to the First Amended Complaint is currently due May 16, 2025.
- 12 5. The parties have been engaging in settlement discussions before and after this Court’s  
       13 Order Denying the Motion to Dismiss.
- 14 6. In an effort to accommodate those discussions and the deadlines set forth in this  
       15 litigation, the parties agree that Defendants have until May 23, 2025 to Answer the  
       16 First Amended Complaint.
- 17 7. This is the first stipulation for extension of time for Defendants to file an Answer to  
       18 the First Amended Complaint.
- 19 8. This Stipulation is made in good faith and not for purposes of delay.

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 21  
 22 DATED May 13, 2025

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 LAW OFFICE OF HAYES & WELSH

/s/ Martin L. Welsh  
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 Nevada State Bar No. 8720  
 MEGAN M. MCHENRY, ESQ.  
 Nevada State Bar No. 9119  
 LARSON A. WELSH, ESQ.  
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DATED May 13, 2025

DICKINSON WRIGHT, PLLC

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3 *Attorneys for Plaintiffs, CF Staffing  
Solutions, LLC and Max Casal*

4 *Attorneys for Defendants, District  
Healthcare Services, LLC; Breaking Silos  
In Medicine, LLC and Habib Shamte,  
M.D.*

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6 IT IS SO ORDERED.  
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8 Dated: May 13, 2025.

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11 UNITED STATES MAGISTRATE JUDGE  
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